

# EXHIBIT 10



A Pennsylvania Limited Liability Partnership  
PENNSYLVANIA • NEW JERSEY • DELAWARE • NEW YORK

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February 22, 2022

VIA EMAIL

Elias P. Soupos, Esquire  
Leydig, Voit & Mayer, Ltd.  
Two Prudential Plaza, Suite 4900  
180 N. Stetson Avenue  
Chicago, IL 60601-6745

**Re: Northern Divers USA, Inc.**

Dear Mr. Soupos:

I represent Atlantic Subsea, Inc. ("ASI"). Your letter dated February 3, 2022 on behalf of Northern Divers USA, Inc. ("Northern Divers") has been referred to me for a response.

ASI has been providing diving and associated marine services to Public Service Enterprise Group ("PSEG") and specifically the Salem and Hope Creek generating stations since 1995. Part of these services have included the routine cleaning of discharge lines using standard industry methods and equipment.

In 2015, as part of routine work on a discharge line at the Salem generating station, PSEG asked ASI to consult with Northern Divers as Northern Divers claimed to have a patented technique to clear pipes that involved special pipe attachments, additives and bubblers. Details of the patent were not disclosed to ASI. In executing the work, ASI utilized standard pumps, manifolds and methodologies. Northern Divers provided no equipment, attachments, connections, fittings or other materials. Northern Divers only contribution to the operation was input on pump layout, which is not patented. The entire operation was fitted, performed and executed by ASI's crew and supervisors. The principal of Northern Divers only attended the first day of the operation. The entire operation was a standard one utilizing commonly known, non-proprietary methodologies.

Again in 2017 and 2018, the Salem generating station discharge line was found to be clogged, and PSEG requested ASI to repeat the same operation as performed in 2015. Since PSEG previously asked ASI to consult with Northern Divers, ASI invited Northern Divers to witness the operations. As in 2015, ASI executed the entire work using standard methodologies, ASI barges, ASI personnel, and standard industry pumps. Northern Divers provided no equipment or components for the work, and provided nothing of value for the same. Indeed, ASI cleared the discharge pipe in the same manner utilized by ASI for 30 years at many jobs, including 26 years at Salem, prior to any involvement by Northern Divers

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In November of 2021, PSEG again asked ASI to clear the Salem discharge line. In connection with this work, Northern Divers demanded that ASI enter into an agreement to pay fees to Northern Divers. Since Northern Divers contributed nothing of value to the previous operations, ASI investigated Northern Divers' patent and learned that Northern Divers had misled both PSEG and ASI into believing that the previous operations had come under the purview of the patent. A comparison of the Northern Divers' patent and ASI's operations for PSEG demonstrate that there has been no infringement of the patent:

<b>Patent</b>	<b>Work Performed at PSEG</b>
Patent is for intake pipes and intake structures.	PSEG work was on independent discharge pipe
Cleaning is done with waterflow against natural flow	Water flushed out using standard pumps in the same direction as flow
Attachments, bubblers and additives in patent	No attachments, bubblers or additives
Variety of water pumps	Standard industry rental pumps
Proprietary turbulence flanges	No special flanges
Forced air with compressors	No forced air or compressors used
Flow directing attachment	No attachments

ASI rejects Northern Divers' claim and demand for payment. Indeed, it is ASI's position that Northern Divers obtained substantial monies from ASI through misrepresentation of the scope of the patent. If Northern Divers persists in its improper demands, ASI will pursue all of its legal and equitable remedies.

Sincerely,

*s/Richard P. Coe, Jr.*

Richard P. Coe, Jr.